

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

LOCAL JOINT EXECUTIVE BOARD OF
LAS VEGAS, affiliated with UNITE HERE
INTERNATIONAL UNION,

Petitioner,

and

TRUMP RUFFIN COMMERCIAL, LLC,
d/b/a TRUMP INTERNATIONAL HOTEL
LAS VEGAS

Respondent.

Case 28-RC-153650

**MOTION REQUESTING INCREASED PAGE LIMIT FOR
REQUEST FOR REVIEW**

Pursuant to Sections 102.67(i)(1) of the Board's Rules and Regulations, the Respondent, TRUMP RUFFIN COMMERCIAL, LLC, d/b/a TRUMP INTERNATIONAL HOTEL LAS VEGAS ("Respondent"), by its attorneys, hereby requests that the Board grant Respondent permission to exceed the fifty (50) page limit on its brief in support of request for review and increase the page limit to one hundred (100) pages. In support of this Motion, Respondent states as follows:

1. On December 14, 2015, Respondent filed fifteen objections to the representation election held on December 4-5, 2015.
2. The hearing on Respondent's objections commenced on January 5, 2016 and ran over the course of sixteen days, producing nearly 2,500 pages of transcript and over 80 exhibits. Following the hearing, the Respondent withdrew two of its fifteen objections.
3. On February 3, 2016, the parties filed their post-hearing briefs, which combined for over 200 pages of factual statements, legal argument, and supporting attachments.

4. On February 18, 2016, Hearing Officer Lisa J. Dunn issued her Report on Objections overruling the Respondent's objections. The Hearing Officer's Report consists of thirty-three (33) single-spaced pages of factual findings, legal analysis, and recommendations.

5. On March 3, 2016, Respondent filed with the Regional Director 254 individual exceptions to the Hearing Officer's Report and a brief in support thereof, which consisted of seventy-six (76) pages of factual statements, legal argument, and supporting attachments.

6. On March 21, 2016, the Regional Director issued his Decision and Certification of Representative, agreeing with the Hearing Officer's overruling of all of the Respondent's objections and issuing a Certification of Representative. In addition to affirming the Hearing Officer's recommendations for the reasons set forth in her report, the Regional Director's Hearing Officer's Report consists of an additional ten (10) single-spaced pages of factual findings and legal analysis.

7. Pursuant to Section 102.67(c), the Respondent intends to file with the Board a request for review of the Regional Director's decision. Per Section 102.67(e), the Respondent's request must be a "self-contained document enabling the Board to rule on the basis of its contents without the necessity of recourse to the record. [] With respect to the ground listed in paragraph (d)(2) of this section, and other grounds where appropriate, the request must contain a summary of all evidence or rulings bearing on the issues together with page citations from the transcript and a summary of argument."

8. Given the number and scope of issues at stake, as well as the voluminous record created in this proceeding, the Board's fifty-page limit on requests for review does not afford Respondent ample opportunity to enable the Board to rule on the basis of the request's contents without the necessity of recourse to the record or to fully address the multitude of findings

contained in the Hearing Officer's thirty-three page Report and the Regional Director's ten-page Decision.

9. Accordingly, the Respondent requests that the page limit for its supporting brief be increased to no less than one hundred (100) pages.

10. Counsel for Respondent conferred with counsel for the Union on Thursday, March 24, 2016 regarding this request. The Union would not agree to any increase in page limit above the fifty pages provided for in the Board's rules.

11. This is Respondent's first request for an increase in the applicable page limit for its request for review, and it will not unduly delay the proceedings nor prejudice the Petitioner.

DATED: March 29, 2016

Respectfully submitted,

TRUMP RUFFIN COMMERCIAL, LLC, d/b/a
TRUMP INTERNATIONAL HOTEL LAS
VEGAS

/s/ Ronald J. Kramer

Ronald J. Kramer
(rkramer@seyfarth.com)
Bryan R. Bienias
(brbienias@seyfarth.com)
SEYFARTH SHAW LLP
131 South Dearborn Street
Suite 2400
Chicago, Illinois 60603
Telephone: (312) 460-5000
Facsimile: (312) 460-7000

William J. Dritsas
(wdritsas@seyfarth.com)
SEYFARTH SHAW LLP
560 Mission Street
Suite 3100
San Francisco, CA 94105-2930
Phone: (415) 397-2823
Fax: (415) 397-8549

Attorneys for Respondent

CERTIFICATE OF SERVICE

I do hereby certify that I caused a true and correct copy of the foregoing MOTION REQUESTING INCREASED PAGE LIMIT FOR REQUEST FOR REVIEW to be served upon the following, via the NLRB's e-filing system and email on this 29th day of March, 2016:

Executive Secretary (via e-file)
National Labor Relations Board
1015 Half Street, S.E., Room 4012
Washington, D.C. 20003

Nancy E. Martinez, Acting Regional Director (via e-file)
National Labor Relations Board
Region 28
2600 North Central Ave, Suite 1400
Phoenix, AZ 85004-3099

Cornele A. Overstreet, Regional Director (via e-file)
National Labor Relations Board
Region 28
2600 North Central Ave, Suite 1400
Phoenix, AZ 85004-3099

Larry A. "Tony" Smith (via e-file and email)
National Labor Relations Board Las Vegas
300 Las Vegas Boulevard South - Suite 2-901
Las Vegas, NV 89101
E-mail: Larry.Smith@nlrb.gov

Eric B. Myers (via email)
Davis, Cowell & Bowe, LLP
595 Market Street
San Francisco, CA 94105
E-mail: ebm@dcbsf.com

/s/ Bryan R. Bienias
Attorney for Respondent